

National Materials Program Pilot Project One Establishment of Priorities

Charter

Objectives

1. Establish a process and understanding on how NRC and Agreement States can collaborate in the identification of work products and establishment of priorities for products needed in the materials program.
2. Demonstrate NRC's willingness to involve Agreement States to ensure that State needs are known and considered along with those identified by NRC staff in the establishment of national priorities for materials program work. Demonstrate willingness of the Agreement States to identify State needs and participate in a process to ensure that they are known and considered along with those identified by NRC staff in the establishment of national priorities for materials program work.
3. Demonstrate how decisions on implementing plans for materials program work could be shared by NRC and individual Agreement States (e.g. how NRC and the Agreement States could reach agreement on respective responsibilities for completion of work products identified in a national priority list).

Scope of Work

1. Obtain information and develop understanding of the processes utilized by NRC and the Agreement States to establish work priorities for the materials program.
2. Examine and develop a process that could be utilized by NRC and the Agreement States in the establishment of priorities for development of materials policy, rulemaking, and guidance products.
3. Examine processes which NRC and the Agreement States could use to make decisions on implementing plans for materials program work and how that work would be shared by NRC and individual Agreement States (e.g. Examine ways that NRC and the Agreement States could reach agreement on respective responsibilities for completion of work products identified in a national priority list).

Work Products

The work products to be completed under this pilot include: (1) a process that NRC and the Agreement States could use to establish priorities for development of materials policy, rule making, and guidance documents, (2) a national priority list agreed upon by both NRC and Agreement States, (3) a proposed framework for the NMP under the Alliance option

Working Group Membership, Organization and Operations

Work under this pilot will be carried out by a working group consisting of NRC and State staff selected by the OAS and CRCPD Boards. They include:

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|---|---|---|
| • | Shawn Rochelle Smith , NRC/STP(Co-Chair) | srs3@nrc.gov |
| • | Ruth McBurney , TDH/BRC (Co-Chair) | <u>Ruth.mcburney@tdh.state.tx.us</u> |
| • | James Lynch, NRC/Region III | jll2@nrc.gov |
| • | Jayne Halvorson, NRC/NMSS | jxh3@nrc.gov |
| • | Anita Turner, NRC/NMSS | alt@nrc.gov |
| • | Kimberly Ferrell, NRC/OCFO | kmf1@nrc.gov |
| • | Robert Walker, MDPH/RCP | Bob.walker@state.ma.us |

Schedule

January 15, 2003

Finalize Basic Charters

June 18, 2003

Submit Work Product Plan for Each Charter and submit them with the Basic Charters to STP, and OAS and CRCPD Chairs for concurrence

February 2, 2004

Submit Draft Pilot Project and products, including an analysis against the success measures as set forth in SECY-02-0074 and provide to STP, OAS and CRCPD Chairs for review

April 15, 2004

Complete final pilot project reports and products and submit copies to the Director, STP, and OAS and CRCPD Chairs

Estimated Resources

384 hours per working group member {0.3 FTE}

480 hours for chair of working group {0.4 FTE}

Teleconferencing and video technology will be used to limit costs. All travel costs will be covered by STP.

National Materials Program Pilot Project 2 National Industrial Radiographer Certification Program

Charter

Objective

The Conference of Radiation Control Program Directors, Inc. (CRCPD), through its G-34 Committee on Industrial Radiography will serve as the lead organization for the oversight of all activities associated with a national industrial radiographer certification program. This includes the review and approval of state government and independent certifying entities' initial applications for approval as recognized certifying entities and subsequent program changes, and follow up evaluations of program status, including test administration and program maintenance activities.

Scope of Activities

The initial committee action will be to formalize the criteria and process in a CRCPD document for reviewing and approving requests to be recognized as certifying entities, through consistent application of criteria that reflect nationally-accepted standards, e.g. for radioactive materials only - 10 Code of Federal Regulations, Part 34, Appendix A; and the equivalent CRCPD document for x-ray only and combination certifications. The document will also include proposed strategies for accomplishing the follow-up program evaluations at predetermined intervals after recognition as a certifying entity is granted.

Step two will be to apply the process for obtaining approval as a certifying entity, including the initial approval or subsequent program changes. The committee will implement the actual mechanics of the sequence of events for initial approval or subsequent program changes.

Work Product(s)

Work Product One is the CRCPD document that contains the formalized criteria and process for reviewing and approving an initial request to be recognized as a certifying entity, subsequent program changes, and proposed strategies for follow-up program evaluations after recognition as a certifying entity is granted.

Work Product Two is a documented evaluation of the application of the criteria and process established in the CRCPD document described as Work Product One. Due to time constraints, the follow-up evaluation of program activities proposed in the document will not be a part of this pilot. The pilot will be applied to Option One, Option Two, or Option Three as described below.

Option One: If presented, the committee will review the application of a potential certifying entity's program. The application could be an initial application or a program's proposed change. The committee will provide an evaluation of its review of the application against the application process and formalized criteria.

Option Two: The committee will review the process previously used in evaluating the American Society for Nondestructive Testing's application for approval of its x-ray and combination certification programs, and provide an evaluation of that review process.

Option Three: The committee will apply the criteria and review process to the certification program of an existing state certifying entity and provide an evaluation of that review process. The state program selected would be a volunteer participant, with the understanding that the state's program itself will not be evaluated. The evaluation is of the application of the criteria and review process developed in the project's Work Product One.

Schedule

Develop a Work Product Plan by March 28, 2003.

Work Product One: Formalization of the criteria and process for reviewing applications or program changes, and documentation of the proposed strategies for follow-up program evaluation will be completed by June 30, 2003.

Work Product Two:

Option One: Review of a new application or program change and evaluation of the process will be completed by December 1, 2003.

Option Two: The evaluation of the process previously used for reviewing ASNT's application will be completed by October 31, 2003.

or:

Option Three: The application of the criteria and review process to the certification program of a volunteer existing state certifying entity and evaluation of that process will be completed by December 1, 2003.

Other Important Dates:

Brief at CRCPD meeting, if needed - May 2003. (Travel and per diem to be paid by NRC STP.)

Brief at OAS meeting, if needed - October 2003. (Travel and per diem to be paid by NRC STP.)

Complete draft pilot project reports and products, including an analysis against the success measures established in SECY-02-0074 - February 2, 2004.

Complete final pilot project reports/products and submit copies to the Director, STP, and OAS and CRCPD Chairs - April 15, 2004

Brief at CRCPD meeting, if needed - May 2004.

Review draft report and submit comments to the Commission - July 30, 2004.

Provide concurrences prior to final report being sent to STP Director - September 30, 2004.

Estimated Resources

The program will involve the participation of the three state representatives (David Turberville - AL; Lauren Palmer - GA; and Chair, Jan Endahl - TX) who serve on the G-34 Committee, and two federal representatives (Jim Myers - NRC STP and Bruce Carrico - NRC NMSS) who serve as NRC advisors on the G-34 Committee. Mr. Donny Dicharry, who represents the American Society for Nondestructive Testing, Inc. (ASNT) and also the Nondestructive Testing Management Association (NDTMA), serves as an advisor on the G-34 Committee and will be invited to participate. Mr. Dicharry's participation as a representative from the industrial radiography industry will be at industry expense.

The estimated distribution of the hours stated are per person, excluding travel time.

Work Product One:

Formalize the evaluation criteria and process, and strategies for follow-up evaluation:

12 hours - initial face to face meeting (Travel time not included. Travel and per diem to be paid by NRC STP.)

20 hours - telephone conference calls (coordinated through CRCPD's OED)

24 hours - information gathering/research

24 hours - document review

16 hours - write up

96 hours

Work Product Two:

Option One:

Review of new application or proposed program change:

12 hours - initial face to face meeting (Travel time not included. Travel and per diem to be paid by NRC STP.)

36 hours - telephone conference calls (coordinated through CRCPD's OED)

48 hours - document review and analyses

16 hours - write up

112 hours

Option Two:

Evaluation of the process previously used:

12 hours - initial face-to-face meeting (Travel time not included. Travel and per diem to be paid by NRC STP.)

20 hours - telephone conference calls (coordinated through CRCPD's OED)

48 hours - document review and analyses

16 hours - write up

96 hours

or:

Option Three:

Application of criteria and review process to existing state certifying entity:

12 hours - initial face to face meeting (Travel time not included. Travel and per diem to be paid by NRC STP.)

36 hours - telephone conference calls (coordinated through CRCPD's OED)

48 hours - document review and analyses

16 hours - write up

112 hours

Estimated additional hours of effort for the project chair to coordinate, compile, format, review, and provide updates/reports on project activities and documents - 100 hours.

National Materials Program Pilot Project 3 Operating Experience Evaluation

Charter

Objectives

The objective of the Operating Experience Evaluation Pilot is to optimize the common use of operating experience information from licensed facilities and trending in integrated NRC and Agreement State review, assessment, and decision-making processes. The pilot should develop and test a structured process for evaluating cumulative licensee data and performance, identify gaps in NRC and Agreement State processes, and develop strategies and tools to make the programs more scrutable, predictable, and transparent. The revised process should produce consistent analyses and results when implemented by the NRC or Agreement States.

Scope of Activities

The pilot will examine NRC and Agreement State processes for collecting, reviewing, analyzing, and disseminating concerns and lessons learned from operating experience. Operating experience information may include: domestic and foreign event data, major team inspections and special studies leading to generic reviews and/or generic communications, industry-wide analyses of performance and trends, insights and metrics amenable to risk-informed decision making, and performance indicators and associated thresholds for increased regulatory attention.

This pilot should: (1) examine the process for evaluating a collective set of Agreement State and NRC licensee events for generic implications and possible additional regulatory action, (2) consider the proposed process, in SECY-02-0216, for providing information on significant nuclear materials issues and adverse licensee performance, and (3) address applicable recommendations identified in incident or working group reports (e.g., Schlumberger Augmented Inspection Team, Davis-Besse Lessons Learned Task Force report, etc.).

The pilot is expected to identify gaps in NRC and Agreement State regulatory processes and opportunities for improvement in program effectiveness. The pilot should develop a set of evaluation tools and metrics to be tested using cumulative data, a standard format, and decision criteria. The pilot should examine and implement lessons learned from past operating experience and associated root cause analyses, risk insights, and corrective actions. Of particular importance are precursor events that provide leading indication of change/problems and/or highlight weakness in regulatory oversight programs. The pilot should also examine methods to advance materials-related contributions to the annual report to the Commission on performance trends in the materials area.

The pilot should develop a proposed regulatory framework and associated program recommendations for consideration by the NRC and Agreement States. The framework should propose enhancements to procedures, organizational review and evaluation methods, sources of information, and methods to better communicate operating experience information. This pilot should provide recommendations for enhanced efficiency and effectiveness of materials oversight programs, including matters related to duplication of effort and/or burden reduction, particularly with regard to the allocation and use of inspection resources.

The pilot should seek broad stakeholder input including the views of the Organization of Agreement States (OAS), Committee of Radiation Control Program Directors (CRCPD), Advisory Committee on the Medical Use of Isotopes (ACMUI), and from open-public meetings with licensees and members of the public, as appropriate.

Work Products

The pilot should prepare: (1) an overall work product plan for developing and testing methods to systematically evaluate operating experience information, and (2) a final work product and associated recommendations for

improving the efficiency, effectiveness, and consistency of operating experience evaluation.

Organization

The Working Group (WG) should comprise Co-Chairpersons from both NRC (Mike Markley, NMSS/IMNS) and Agreement States (Marcia Howard, State of Ohio), at least one additional Agreement State representative, and one NRC representative from an NRC Regional Office materials program. NRC membership shall not exceed Agreement State participation.

Schedule

The updated schedule for completion of this pilot is provided in the Work Product Plan consistent with the National Materials Program Pilot Projects, Implementation Plan.

Level of Effort

Approximately two person-days per month will be required of participants. The Working Group Chair will require, on average, eight person-days per month for this effort. Actual Working Group travel should not exceed three meetings per year. Teleconferencing and video technology will be used to limit costs.

Revision 5

08/04/03

**National Materials Program Pilot Project 4
Agreement State Assumption of Responsibility for Development of Guidance for New
Use or Modality Not Previously Reviewed and Approved**

Charter

Objectives

To identify an implementation strategy for pilot project #4 defined in SECY-02-0074, and to develop licensing and inspection guidance for a new use of material, or new modality, not previously reviewed and approved by the NRC. This pilot project will better define the feasibility and viability of the Alliance Option recommendation by the National Materials Program Working Group. This pilot project is to be implemented by the Organization of Agreement States (OAS).

Scope of Work and Work Products

Under this pilot project an Agreement State, groups of Agreement States, or individual experts within the Agreement States would develop licensing and inspection guidance for a new use of material, or new modality, not previously reviewed and approved by the NRC.

Planned accomplishments include:

1. Survey the Agreement States, NRC Headquarters, and the NRC Regions to ascertain if there is a new use of material or new modality that would qualify under this pilot project.
2. For the new use of material or new modality identified, the OAS Executive Board will assign a Chair for this Working Group.
3. The Chair will identify which medical modality to be used for the Pilot Project from the list of potential modalities identified as a result of the survey completed in Objective 1. Once the medical modality has been identified, Agreement States (and NRC) will be solicited for volunteers to the Working Group.
4. The Working Group will develop inspection and licensing guidance for the new modality and work with the OAS and NRC to determine the process for accepting the guidance and incorporating it into the existing licensing and inspection system.

Working Group Membership

Working Group Chair: **Kathy Allen, Illinois**

The Working Group shall consist of the Chair and not more than 5 members from Agreement States and the NRC if they choose to participate.

Working Group Operations

It is anticipated that this group will work via e-mail and teleconferences. There may be need to meet face-to-face or travel to meet with a manufacturer or expert in the use of a particular modality.

Working Group members are expected to research the chosen modality, participate in drafting and reviewing documents, and assist in editing the final product.

The NRC will provide special logistics, such as multi-line teleconferencing, and travel support for this pilot project, including travel and per diem expenses.

Working Group Milestones

October 1-3, 2002	Survey the Agreement States, NRC Headquarters, and the NRC Regions at the OAS Meeting to determine if there is a new use of material or new modality that needs licensing or inspection guidance.
January 15, 2003	Draft Charter to NRC
February 1, 2003	Chair to identify modality to be used for Pilot Project
February 15, 2003	Solicit state members for Working Group
February 28, 2003	Receive nominations from NRC for NRC membership on Working Group
March 2003	First Conference Call for Working Group
September 2003	Draft Work Product available for comment
October 2003	Receive comments
November 2003	Finalize Work Product

Estimated Resources

Working Group participants should anticipate spending up to 40 hours on the initial drafting/reviewing process during late spring of 2003, and possibly up to 20 hours in late summer/early fall 2003 to finalize the Draft. All times are approximations.

National Materials Program Pilot Project 5
Writing Team to Revise IMC 2800, Materials Inspection Program, February 28, 2002,
as amended January 15 and August 15, 2003, for the National Materials Program Pilot Projects
[SRM-SECY-02-0107-SECY-02-0074-SECY-01-0112, August 20, 2002]

Charter

Objectives

In order to implement Phase I and Phase II recommendations and conserve resources for the materials program in the remainder of FY02 and thereafter, the Writing Team (WT) is chartered to revise IMC 2800 and its associated non-medical Inspection Procedures (IP) and non-medical Temporary Instructions (TI) in order to align the materials inspection program with the risk-informed and performance-based regulatory approach.

The WT may incorporate innovative approaches not included in Phase I and II recommendations for the implementation of the inspection process to achieve long-term increases in effectiveness and efficiency.

In order to obtain information on the feasibility and viability of the NMP-"Alliance" option, the WT will solicit Agreement State participation for the work described below.

Background

On November 14, 2000, the Mallinckrodt Lessons Learned Task Group Report (Phase I) recommended specific actions to NMSS as short-term changes, long-term changes, rulemaking, referral to Phase II (review of the entire materials program), and referral to the National Materials Program Working Group. The Phase I recommendations addressed IMC 2800 and IP 87110-series that describe the materials inspection program. NMSS developed an action plan that was provided to the Phase II Review Group.

On August 13, 2001, the Phase II Byproduct Materials Review Report endorsed the majority of the recommendations that had been referred by Phase I, thereby encouraging NMSS to complete action on those items. Phase II recommended broad changes to NMSS policies, procedures, and processes to improve effectiveness and gain efficiencies to save NMSS resources for the materials program. Phase II recommendations addressed IMC 2800 changes and provided resource estimate costs and savings for implementation of each recommendation.

With input from the Regional Administrators, NMSS considered this information and committed to implement the Phase II recommendations, including the endorsed Phase I recommendations. NMSS decided not to consider any impacts from potential additional security measures resulting from the September 11 terrorist activities at this time. NMSS will consider impacts from security considerations based on information available from the Commission.

Scope of Work

The WT will revise IMC 2800, IP 87110-series, and TIs to implement the following Phase II recommendations that specifically addressed IMC 2800:

- II-5 (revise inspection priorities),
- II-9 (inspector empowerment),
- II-10 (streamlined inspection preparation),
- II-11 (initial inspections),
- II-12 (field office inspections), and
- II-16 (expanded use of NRC Form 591).

The WT will not validate the risk-informed inspection priorities determined by the Phase II Review Group. Implementation of II-6 (periodic assessment) will provide the opportunity to revisit this issue in the future.

The WT may select additional Phase I and II recommendations to be included in the revisions, e.g., II-6 (periodic assessment) and II-7 (performance-based IP's).

The WT will initiate a Temporary Instruction for the revised Materials Inspection Program (TI 2800/033) in order to evaluate resource savings for the materials program. The WT will incorporate selected Phase I and II recommendations for IMC 2800 into TI 2800/033. The revisions to the IP 87110-series will not include the interim compensatory measures (ICM). A separate TI may be developed by other staff for the ICM. However, if

information is available from staff actions regarding security that could influence the routine inspection program, this information will be considered in the final version of IMC 2800.

The WT will revise the seven non-medical IPs (87110, 87111, 87112, 87113, 87114, 87117, 87120) and will coordinate during this period with another writing team that will be revising the four medical IPs (87115, 87116, 87118, and 87119) for the implementation of revised Part 35.

The WT will analyze TI 2800/033 and the revised inspection procedures, prepare final versions of IMC 2800 and the associated inspection procedures, and provide a lessons learned report for the NMP Pilot Projects.

Working Group Membership, Organization and Operations

Under the expedited process, the roles of the WT and Pink/Red Team (PRT) are as follows.

The PRT is responsible for providing policy direction to the WT and will be engaged regularly throughout the process. The WT provides the first draft of revised IMC 2800 to the PRT for review and comment before initiating TI 2800/033 on April 1, 2002. Interim approvals are not required on subsequent draft revisions of IMC 2800, TIs already in effect, or the IPs. At the end of the schedule, the WT will submit final versions of the revised products for the PRT's approval that will be substituted for the Office concurrence process.

The work products will be coordinated with the Implementation Plan for NMP Pilot Projects.

This organization and operation will accomplish the objectives set forth above within the expedited schedule indicated below. WT business will be conducted by teleconference and email. Several week-long meetings will be held at NRC in Rockville, MD. Following are the members of the WT and PRT. As duties and needs arise, the inherent authority of substitutes for the WT and PRT members will be recognized for a member who finds it necessary to be absent from their assignment.

Writing Team		Pink/Red Team	
NMSS	Thomas Young (pilot project Chair and Team Leader), Anita Turner, Jim Smith	NMSS	Thomas Essig
Region I	John McGrath	RI	Christiana Lui
Region II	John Pelchat	RIII	George Pangburn
Region III	Jamnes Cameron	RIV	Gary Shear
Region IV	Michael Fuller	STP	Elmo Collins
STP	Richard Blanton	OGC	Josie Piccone
OAS/CRCPD	Robert Gallagher (Massachusetts)	OAS/CRCPD	Stuart Treby
			James Peterson
			(South Carolina) amended 6/19/03

Schedule

February 6, 2002	WT Teleconference, NMSS explains tasks and initial assignments to the appointed members
February 25 - 28, 2002	WT, 1 st draft (revised IMC 2800 and TI 2800/033) for PRT
February 28, 2002	PRT approves WT Charter
March 1, 2002	WT provides 1 st draft to PRT
March 6 - 22, 2002	WT revises TI 2800/033
March 25 - 29, 2002	WT finalize TI 2800/033 and develop training and implementation plans for TI 2800/033 roll out
***March 31, 2002	WT issues TI 2800/033
April 1 - 14, 2002	WT, Regional training and implementation for TI 2800/033
April 15, 2002 - June 30, 2003	Pilot use of the TI 2800/033 and collection of data
July 2002	WT 1 st draft of the revised IPs
October 1, 2002	Implementation of IPs
October 2002	Mid-pilot evaluation of data (April - September, 2002)
November 2002	WT develop training for revised IPs
January 2003	WT provides Regional training for revised IPs
January 15, 2003	Amended Charter to STP for NMP, ***After this date, the project was coordinated with the National Materials Program-Pilot Projects as Pilot No. 5 (SRM-SECY-02-0107/02-0074/01-0112, August 20, 2002)
March 28, 2003	Work Product Plan to STP for NMP
March 31, 2003	Work Products posted in STP, NMP Web Page
July - August 2003	WT final analysis, lessons learned report, final versions

September 2003
October 2003
February 2, 2004

PRT approves lessons learned report and final versions
Final versions of IMC 2800 and IPs are effective
Final versions and lessons learned report to STP for NMP

Estimated Resources

Each WT member will contribute a total resource of 0.1 FTE in FY03.